## Comment Letter AS009 Continued

District 6

41. It appears that the Draft EIR/EIS looks to the year 2020 in developing the capacity of the HST system. On page S-14, under Growth Potential, there is information of population growth to 2035. At the program level, the draft needs to go beyond a 15- to 20-year planning horizon and assess the needed capacity of the HST system, to 2035 at a minimum. AS009-41

42. Although conceptual, the proposed HST alignment appears to run near and parallel State Route (SR 99) through the San Joaquin Valley. The HSRA needs to coordinate with the Department and regional planning agencies for planning efforts along SR 99, including use of information in the Transportation Concept Report (TCR) and the Route 99 Corridor Master Plan. AS009-42

43. The draft should provide a general discussion (matrix) of benefit/cost and environmental comparisons between at-grade, elevated guideway, and below grade (open trench or tunnel) separations. For instance, below grade segments running through built communities may be more environmentally acceptable and cost-effective than an elevated guideway segment. AS009-43

44. The location of a high-speed maintenance and storage facility in a central San Joaquin Valley community (Fresno, Tulare, Visalia, Bakersfield, etc.) could be an economic benefit for this high unemployment area of the state with its potential for jobs creation. AS009-44

45. Page S-15, second paragraph, first sentence states that the proposed HST system would provide "…an improved level of connectivity between existing transportation modes (air, highway, transit) that would not be provided under the No Project or Modal Alternative." This improved level of connectivity needs to be clearly explained. AS009-45

46. Page S-16, first paragraph, third sentence states that the HST Alternative would have "lower impacts because of extensive use of existing right-of-way…" The HSRA needs to address encroachment, operational, and maintenance issues along the rights-of-way of highway facilities. AS009-46

47. Page 3.1-6, "Sacramento to Bakersfield" section, the paragraph contains information on the six airports and three intercity highways (SR 99, I-5, and I-80) considered in the analysis of the Modal alternative. There is no discussion of the interconnectivity potential that the HST alternative could provide for the Central Valley airports and intercity highways. AS009-47

48. Any positive impact of the HST alternative on goods movement in the Sacramento to Bakersfield segment needs to be emphasized. Goods movement is a concern in the San Joaquin Valley, given the high level of truck traffic on highways and rail freight service on the Union Pacific and Burlington Northern Santa Fe rail lines. AS009-48



49. Page 3.1-17, "High-Speed Train Alignment Option Comparisons" section, the list of major alignment and station options includes activity centers in Sacramento, Modesto, Merced and Bakersfield. Given that the City of Fresno is the most populous city in the San Joaquin Valley, Fresno should be listed as one of the major alignment and station options. The Council of Fresno County Governments has taken a position that a high-speed rail station in Fresno County should be located in downtown Fresno. For Fresno, the only station option carried forward for further consideration in the Program EIR/EIS is located in downtown Fresno within the UP Railroad right-of-way. This site would be closest to the city's center, as well as the triangle formed by SR 99, SR 41 and SR 180. This would provide good connectivity (including bus transit) and accessibility, which would result in higher ridership (2.5 to 3.2 million total boardings annually by 2020) and revenue potential than other areas within Fresno County. This station would be generally compatible with existing and planned development and is the preferred choice of the City of Fresno. AS009-49

50. Page 3.7-2, under Land Use Compatibility, middle of first paragraph states, "For highway corridors (under the No Project and Modal Alternatives) and for proposed HST, land use compatibility was assessed using GIS layers (or aerial photographs where available)…." The HSRA needs to incorporate information from Caltrans' planning documents and activities for highway corridors potentially impacted by high-speed rail, two of which are described below. AS009-50

51. A Transportation Concept Report (TCR) is a long-range planning document that establishes a planning concept for the corridor for a planning horizon (25 years). The TCR provides route data and information, as well as current and projected operating characteristics. Considering reasonable financial and physical constraints, the TCR defines the appropriate Concept Level of Service (LOS) and facility types for each route. It broadly identifies the nature and extent of improvements needed to attain the Concept LOS. Capacity-enhancing improvements, such as lane additions, are the primary focus for LOS attainment. The TCR also identifies transit, the high-speed passenger rail system, and the deployment of Intelligent Transportation Systems as integral to route corridor development. The Ultimate Transportation Corridor, as identified in the TCR, ensures that adequate right-of-way is preserved for the ultimate projects beyond 25 years. AS009-51

52. As previously mentioned, the HSRA should coordinate with the Department on the Route 99 Corridor Master Plan, currently being developed. The Department and local communities are working together to develop a master plan to improve the SR 99 corridor. The Route 99 Corridor Master Plan will strengthen community identity, unify freeway improvements, and develop design concepts that tie communities through the San Joaquin Valley together and foster a valley-wide identity. In addition to dealing with aesthetic concerns, the document will address capacity needs as increased regional and interregional traffic puts more stress on the corridor. AS009-52

53. The development of the Route 99 Corridor Master Plan will guide public and private sector decisions in the development of the SR 99 Corridor by setting specific improvement approaches and themes. In the spirit of environmental justice, the AS009-53

## Comment Letter AS009 Continued

Department is looking for public and community involvement, which results in ownership of the plan by everyone. AS009-53 cont.

54. The information presented in the Program DEIR is too broad for Traffic Engineering to analyze and comment on. It appears that the proposed alignment would be adjacent or within existing railroad and highway right-of-way. Preliminary engineering drawings are needed to adequately evaluate potential impacts to the existing highway facilities. Please be advised that any future development adjacent to a State Route, whether the entitlement is deemed by the lead agency to be discretionary or ministerial should be sent to the Department for review. AS009-54

District 7

55. Other local/regional proposed High Speed Rail (HSR) Projects need to be mentioned in the program document such as the numerous Southern California HSR MagLev studies, as well as the proposed Las Vegas, Nevada to Anaheim, California (Disneyland) project. AS009-55

56. Preferred alignment from Kern County into North LA County – A preferred alignment should be determined and included in the FEIR/FEIS program document. SCAG's Palmdale to LAX study may be an additional resource in respect to the Palmdale alignment. AS009-56

57. Future alignments of the HST system in Southern California – how will the ultimate California HST connection(s) between the Los Angeles Union Station and San Diego be implemented? AS009-57

58. Planning Coordination – A need for the Authority and Departmental coordination for engineering, design, right-of-way, planning, intermodal connectivity, environmental impacts, potential impacts to Native American burial and other archaeological sites, impact to wildlife corridors, noise impacts, construction impacts, need for cooperative agreements, maintenance and operational activities, etc. should be fully discussed in the FEIR/FEIS program document. AS009-58

59. Corridor Preservation – Along with corridor alignment, corridor preservation will be necessary including right-of-way acquisition and freeway alignments should be identified in the EIR/EIS program document. AS009-59

60. System Compatibility – the proposed steel rail technology is different than the MagLev HSR studies that are currently being studied in Southern California. The problems relating to lack of system compatibility between competing projects should be discussed. The rationale for selecting the HST steel rail technology over the MagLev technology should also be discussed. AS009-60

61. Construction Management Plans – construction management plans would include the need for detours, lane closures, haul routes, etc. (This will be needed during implementation phases.) AS009-61



62. How will construction impacts on the regional system be mitigated during the ten-year design-build period? How and when will the decision be made to select contractors, partners and/or private enterprise for Design-Build, Operate and Maintenance of the train system? Would additional legislation need to be in place before such arrangement? AS009-62

63. The CHSRA is considering high-density development at the major center stations. Will this cause increased distribution traffic impact to the state transportation system. If so who would pay for needed mitigation? AS009-63

District 10

64. Map 4 - Sacramento to Bakersfield. The BNSF alignment to the east of Stockton does not depict a potential station (unlike the UPRR alignment that shows the ACE Downtown Station). A potential rail station should be considered and depicted for the BNSF rail alignment to the east of Stockton. Also, a discussion about intermodal transportation connections should be included (re. connection to AMTRAK, regional bus system, ACE train, etc.). AS009-64

65. Map 5 - Stockton to Merced. The map depicts proposed alignments that bypass Modesto and Merced to the west of each respective city. These bypass alignments can be growth inductive, and the EIR should discuss and address these issues and potential impacts. AS009-65

66. Maps 5 and 6 - Stockton to Merced, and Merced to Fresno. The two proposed alignments are to the west of the new UC Merced campus (under construction). The EIR should include a discussion concerning options to include and support the new UC Merced campus and students. AS009-66

67. Page 3.1-5, Item C, Traffic and Circulation Resources by Region, Bay Area to Merced. Route 205 should be included with I-580 and SR-152 as providing access to I-5 in the Central Valley. Route 205 is a significant east/west connector from the San Francisco Bay Area to the San Joaquin Valley, and it is used extensively by commuters and for goods movement. AS009-67

68. Traffic and Circulation Element, Section 3.1, Page 3.1-17, B, Sacramento to Bakersfield, HST Alignment Option Comparison. Although major alignment and station options are discussed for Sacramento, Modesto, Merced, and Bakersfield, there was no discussion for Stockton. It is recommended that Stockton be included in this section. AS009-68

69. Great care needs to be taken in understanding the demographics of the potential riders and how it relates to truly high-speed transportation system. AS009-69

70. Forecasting such a project as HST will need a well-calibrated Mode Choice Model such as a Logit Model. AS009-70

71. The route adoption and station placement will be key to the success of this project. If inadequate transit connectivity exists, then the full potential and benefit of this HST project would not be realized. AS009-71

## Comment Letter AS009 Continued

72. Community involvement and support is important when planning and deciding on rail alignments and station locations. AS009-72

73. The document should include issues pertaining to context sensitive solutions, especially when the rail alignments and stations are adjacent to or in proximity to existing transportation infrastructure (such as highways and city streets). AS009-73

74. Any phasing (incremental approach) of the HST system should fully include and address impacts on the existing regional transportation system and connectivity to other transportation systems. AS009-74

75. On a programmatic-level this document cannot be expected to contain the project-level detail necessary to fully analyze impacts. However, when alignment decisions are made that have the potential for complex, economic, and social impacts, or benefits, a case could be made for including a detailed cost/benefit analysis. The Altamont Pass alignment for the Northern Mountain Crossing was apparently discarded based on quantitative data alone, whereas, a case could be made for that alignment based on qualitative data and analysis would have shown a viable, if not preferable alternative. The Los Banos and Merced options could be growth inducing and escalate land conversions from agriculture. The Altamont Corridor is, for the most part, already, or planned to be, urbanized. The rationale or bias for a linkage through San Jose based on the split, two versus three node, configuration of the two approaches is simply not adequately supported in the documentation. AS009-75

District 11

76. In general, the District is supportive of the HST project as it would improve mobility for residents and visitors in San Diego by providing another transportation choice for inter-regional travel. If the HST service were competitive with road or air travel, then the project might serve to reduce the number of vehicles on major highways, thereby helping to alleviate traffic congestion, air pollution, road maintenance, etc. AS009-76

77. District 11 has been closely involved with various committees and studies related to the proposed coastal HST route (i.e.: the LOSSAN corridor). These comments will not be repeated here. Regarding the proposed inland (I-15 corridor) routing, the District has for a number of years been working on a concept called Managed Lanes or a "freeway within a freeway" which would allow for directional capacity adjustment on demand. It is important to note that the Managed Lanes design as currently planned maximizes the use of the I-15 right-of-way between SR-163 and SR-78, leaving little or no room for additional HST facilities. AS009-77

78. The District and SANDAG are supportive of the HST concept as described in the Program EIR/EIS document. The SANDAG / Western Riverside COG I-15 Interregional Partnership (IRP) Policy Committee also supports the HST system which could potentially divert long distance travel between Riverside County and San Diego onto a new system paralleling I-15. AS009-78



79. Although without the addition of a specific commuter-oriented service the HST system may serve only a small percentage of I-15 commute trips due to wider station spacing and longer service frequency. Commuter use of HST would depend on significant cooperation and coordination of station location / spacing and service frequency with local governments and transit operators, as well as implementation of higher intensity transit oriented design around stations. AS009-79

80. Furthermore, regarding station locations and the overall scope of the project, the District encourages HSRA to look at alternatives which extend the HST line into heart of the City of San Diego. A station located in or immediately near downtown San Diego has the potential to dramatically increase ridership on the system by providing a convenient multi-modal access point for large numbers of people. In the inland I-15 corridor specifically, the District encourages the Agency to consider alternatives extending the line past the proposed Qualcomm Stadium station into downtown, and possibly beyond to Chula Vista and the Mexican border. AS009-80

81. Regarding the urban design and visual impact assessment analysis methodology used in the Program EIR/EIS, the document follows CEQA guidelines rather than the more demanding Federal level methodology used by FHWA. This approach tends to simplify the study but results in a less comprehensive analysis. Environmental and visual considerations will likely be significant concerns in the more specific focus EIR document(s). AS009-81

District 12

82. Was a Major Investment Study (MIS) prepared for the HST project? It is not clear whether one was prepared. Also, are there any previous feasibility studies or long-term rail plans prepared for this project? AS009-82

83. Please include a discussion on the feasibility of utilizing the HST alignment for cargo transport during non passenger-operating hours. There should be a feasibility study for utilizing the HST alignment for cargo transport, and the Authority should determine if the cargo transport option would also potentially reduce the truck traffic on intercity highways parallel to the HST alignment. AS009-83

84. In the urban areas, the tracks should be grade separated in Orange County. A tunnel, trench or an elevated alignment would improve safety and create a buffer for pedestrian and local traffic. AS009-84

85. Please include a discussion on the potential growth-inducing impacts associated with the HST project at hub stations. AS009-85

86. According to the travel conditions summary section of the Program EIR/EIS, the HST could experience overall savings in passenger costs between 8% and 44% compared to the No Project alternative. It is not clear whether this cost savings would be experienced during the initial operation of the project or over the operational life of the project. AS009-86

## Comment Letter AS009 Continued

87. The Program EIR/EIS states the HST would also reduce traffic on intercity highways. What plans are there to encourage ridership to maximize this shift in mode choice? AS009-87

88. There should be further discussions on the operational costs of the proposed HST project. The project discusses the total project costs, but not the costs associated with the operations and maintenance of the project. The analysis should layout the costs of ridership and the estimated subsidy expected for the project. AS009-88

89. We would like to see a discussion about the impacts to the Department's facilities (e.g. encroachment into right-of-way). Also, please include a discussion on support facilities, i.e. park and ride lots, transit connections, modal connections from the freeways systems in Orange County. AS009-89

90. The cities of South Orange County, San Clemente, Dana Point and San Juan Capistrano, participated in both the LOSSAN and the High-Speed Rail Studies and formed a Rail Working Group. This group concluded with findings to support the Interstate Long Split Tunnel alternative developed in the LOSSAN study. AS009-90

91. District 12 and OCTA have plans to conduct an I-5 MIS planning effort. Along with freeway improvements, rail expansion and track alignments will be an important subject in the I-5 MIS. The MIS will explore all modal types and expansion of transit and rail through the I-5 corridor. The MIS, HST, and LOSSAN plans should be consistent in the treatment of rail expansion and alignments. AS009-91

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## Response to Comments of Warren Weber, Chief of Division of Rail, California Department of Transportation, August 31, 2004 (Letter AS009)

**AS009-1**

The travel time on page S-4 of the Draft Program EIR/EIS refers to the HST service between Los Angeles to San Diego via the Inland Empire (I-215/I-15). The HST service along the LOSSAN corridor would go no further south than Irvine.

**AS009-2**

The HST service would go no further south along the LOSSAN corridor than Irvine. The segment from Los Angeles to Irvine (44 miles) is considered a relatively small segment of the statewide network (over 800 miles).

**AS009-3**

Acknowledged. Please see the findings of "Economic Growth and Related Impacts" study summarized in Chapter 5 of the Draft Program EIR/EIS. This analysis concluded that the HST Alternative would result in denser development than the No Project and Modal alternatives even without changes in land use policies and new incentives for densification. Additional land use strategies/incentives could increase this benefit of the HST system. Please also see standard response 2.1.12 in regards to HST station locations.

**AS009-4**

The word "predominately" has been substituted for the word "completely" in Section S.6 of the Final EIR/EIS document. Therefore, the Final EIR/EIS states, "The HST Alternative would provide a predominately separate transportation system…".

**AS009-5**

Yes.

**AS009-6**

Project specific level of detail and preliminary engineering analysis will be required to determine if there is enough room for the HST infrastructure to completely fit, co-locating within existing freight right-of-way (where the alignment is designated as being in or adjacent to freight right-of-way). At a conceptual level, it appears that co-location may be possible since most of the freight right-of-way is presumed to be at least 100 feet wide.

**AS009-7**

As stated on page 2-7 of the Draft Program EIR/EIS, the forecast ridership demand is approximately 58 million intercity trips and 10 million long distance commute trips. For the purpose of defining the Modal Alternative, the intercity trips were divided between air and highway modes based on the expected proportion of the 58 million trips that would be diverted from each mode (approximately 41% (24 million) from highway and 59% (34 million) from air. The long distance commute trips (10 million) were assumed to be highway trips, thus raising the proportions to approximately 50% each for the development of the Modal Alternative, which is appropriate for the analysis presented in the EIR/EIS. The geographic distribution of diverted air and highway trips was also available from Business Plan ridership studies.

**AS009-8**

The assumption of 2 dedicated tracks for passenger service and 2 for freight was made for the purposes of defining the physical infrastructure and required land area (footprint) and basic operating characteristics (i.e., travel time). Specific operating plans would be defined and evaluated in subsequent project level studies.

**AS009-9**

The Authority considers safety as a critical objective for the proposed HST system. The additional definition of safety and external security enhancements would be premature and too speculative at this stage of study, but would be considered during project-level review.
The HST tracks will be fully access controlled through the use of fencing and wayside monitoring and detection systems along at-grade sections and at other potential access points. The system will also be fully grade separated from other modes of transportation (i.e., roadways). Stations and rail yards will be designed to restrict access to track areas while allowing for safe and efficient processing of passengers and trains. Please also see standard response 2.8.1.

**AS009-10**

The system would not keep customers out of stations. The conceptual design assumes a considerable amount of at-grade configuration (see figures 2.7-5, 2.7-7A, 2.7-7B, 2.7-9, 2.7-11, and 2.7.13), where the HST system is at-grade, it would be fully fenced. Section 3.2.3 of the Final Program EIR/EIS has been revised to read "fully access controlled," instead of "fully fenced".

**AS009-11**

The sentence has been revised to remove the reference to the LOSSAN corridor.

**AS009-12**

The referenced sentence explicitly states "…in several of the rail corridors under consideration…". It should not be inferred that LOSSAN is one of these corridors. Nor should it be inferred that additional right-of-way would not be required in the majority of the alignment options considered throughout the state. A significant amount of right-of-way would be required throughout the system as reflected in the HST Alternative description (Section 2.6) and the capital costs (Section 4.2.2).

**AS009-13**

The referenced sentence has been replaced with the following: "The second alignment is a shared use alignment that would provide HST service along the existing LOSSAN corridor. The segment from Union Station to Fullerton would be improved to provide a total of 4 tracks and the segment from Fullerton to Irvine would be improved to provide a total of 2 tracks. Improvements in the Fullerton to Irvine segment would be made primarily within the existing right-of-way, however infrastructure requirements would be further evaluated at the project level."

**AS009-14**

Please see standard response 6.40.1, standard response 6.41.1 and standard response 6.42.1. The "low-end" improvements (along the LOSSAN corridor) have not been carried forward for further consideration.

**AS009-15**

Only a small portion of the Los Angeles to San Diego via Orange County alignment option received a "high" and "medium" rating for property impacts. The property section states "…no more than 2 m (3km) of rail alignment and station locations (1% or less of the total alignment distance in the LOSSAN region) would have a high potential for property impact,…" . The reference to high potential for property impacts for the HST Alternative is directly associated with these specific portions of the alignment option. The "low" rating for the majority of the segment considered resulted in an overall "low" rating. This alignment option was also rated "low" for potential environmental justice impacts, since the areas of potential impact represented a relatively small portion of the overall alignment length and as stated in the Draft Program EIR/EIS, the residential uses along the alignment option identified with high minority populations are typically buffered by non-residential uses. Should the HST proposal move forward, additional study will be done as part of project-level studies.

**AS009-16**

Please see Standard Response 6.41.1.

**AS009-17**

For comparison with other system alternatives (No-Project and Modal) the total number of potential hazardous material and waste sites identified under the HST Alternative is based on a statewide system of alignment options that most closely reflects the system assumed in the development of the ridership forecasts or "representative demand", which did not include the LOSSAN corridor. (see Page 2-7 of the Draft Program EIR/EIS) Also, please see standard response 6.41.1.

**AS009-18**

See response to Comment AS009-13.

**AS009-19**

Please see standard response 6.41.1.

**AS009-20**

Purchase of the initial fleet is considered a capital cost in the Program EIR/EIS and was included. [see 4-C-13 and 4-C-18 of Appendices]. Fleet maintenance, replacement, depreciation, and interest are included in Equipment Maintenance in Table 4.3-3. Propulsion (power) costs are also included in Table 4.3-3. Labor is included in all categories, as appropriate in Tables 4.3-3 and 4.3-4.

**AS009-21**

The Pacific Surfliner service does not provide intercity conventional rail service between San Jose and Santa Barbara and requires at least one modal transfer. Table 1.2-3 does not include intercity bus service travel times – which would be faster than any existing conventional rail service between these points and would not require a transfer.

**AS009-22**

Acknowledged. Page 1-10 of the Draft Program EIR/EIS does not state that the Coast Corridor is state-supported.

**AS009-23**

The Final EIR/EIS has been changed to acknowledge the existing rail service connections at Burbank Airport.

**AS009-24**

Section 2.5.1 "Modal Alternatives Considered and Rejected" provides the explanation as to why conventional rail improvements were not included in the Modal Alternative (page 2-17 of the Draft Program EIR/EIS. Please also see standard response 2.9.1 in regards to the rejection of HST technologies at speeds below 200 mph. The slower conventional rail service sharing tracks with conventional freight services with much longer travel times (which are not competitive with air and auto travel modes) would not "meet the same intercity demand that would be served by the proposed HST system". The Program EIR/EIS acknowledges that the Modal Alternative consists of future expansions of highways and airports since highway and air transportation travel are clearly the predominant modes for intercity trips in California (Draft Program EIR/EIS page 2-15).

**AS009-25**

The only commercial carrier, America West, stopped commercial service at Stockton metropolitan Airport in September of 2003 during the late stages of preparation of the Draft EIR/EIS. San Joaquin County is actively seeking a new commercial carrier for the Stockton airport. For the purposes of defining the No-Project and Modal Alternatives, Stockton Metropolitan Airport will remain in the document with appropriate clarifications. However, as in the Draft Program EIR/EIS, it is not improved under the Modal Alternative.

Figure 2.4-1 has been revised per the comments.

**AS009-26**

The footnote on page 3.4-1 has been revised to read as follows: "This eliminates the need for trains to blow horns or sound warning bells at these grade separated (previous grade crossing) locations."

**AS009-27**

Land use compatibility, as considered for determining the extent of potential property impacts, was reviewed based on existing land uses and for future land uses, based on general plans and other planning documents. It is within the authority of local land use agencies to consider planning measures to reflect proposed future transportation projects, including rail projects. The Authority intends to work with local jurisdictions during implementation if a decision is made to go forward with the proposed HST program.

**AS009-28**

Acknowledged.

**AS009-29**

Local jurisdictions would be responsible for general plan revisions.

**AS009-30**

Coordination of preservation efforts could be considered in the future, following the completion of this program EIR/EIS process and after a decision has been made to move forward with the proposed HST system.

**AS009-31**

Acknowledged. The Authority has identified the downtown Sacramento station site as the preferred HST station location for a potential station to serve the Sacramento area. This station option would maximize opportunities for intermodal connectivity and is located in downtown Sacramento within walking distance of the State Capitol.

**AS009-32**

The Authority would coordinate with Caltrans during subsequent project level environmental reviews of segments with the potential to affect the Department's facilities.

**AS009-33**

Acknowledged. These studies will be considered as part of future project specific study should the HST proposal move forward.

**AS009-34**

Acknowledged.

**AS009-35**

Acknowledged that Caltrans has established requirements for work to be performed within state highway right of way or affecting state highway facilities.

**AS009-36**

Please see response to Comment AS009-35.

**AS009-37**

Acknowledged. The sentence has been revised.

**AS009-38**

Acknowledged.

**AS009-39**

Acknowledged.

**AS009-40**

Acknowledged, however, the Authority has determined to remove from further consideration the suggested station at Los Banos.

**AS009-41**

Acknowledged. The Draft EIR/EIS does not look only to the year 2020 in setting the capacity of the system. The ridership and revenue forecasts use 2020 as the base forecast year. However, the ridership and revenue studies also evaluated how ridership would grow over time and as the system matures, up to the year 2050 (see Authority's June 2000 Business Plan and CRA ridership and revenue studies). As noted on page 2-7 of the Draft Program EIR/EIS, the HST system would have a capacity to carry more than two times the high-end forecasts for 2020. Please also see Section 3.2.3 of the Program EIR/EIS under "sustainable capacity".

**AS009-42**

See response to Comment AS009-32.

**AS009-43**

The Draft Program EIR/EIS described the alignment configuration of each alignment option considered and the supporting information as to why particular configurations were proposed (e.g., constructability, cost, land use constraints, etc.). The specific issues vary by segment and it is not practical to consider such site-specific details at the program level. Site–specific alignments would be studied and refined at the project level.

**AS009-44**

Acknowledged.

**AS009-45**

Please see Section 3.2.3 of the Program EIR/EIS under "Connectivity". See Final Program EIR/EIS Section 3.2.4.B. Operational and maintenance issues associated with locating HST infrastructure within or adjacent to existing rights of way are highly site specific in nature and will be addressed during the subsequent project level analysis, as more specificity is defined for proposed alignments and facilities.

**AS009-46**

Encroachment, operational, and maintenance issues along the right-of-way of highway facilities, along with other issues related to HST constructed in or adjacent to highway right-of-way, were factors considered in the elimination of highway alignment options throughout the state (please see Chapter 2, Section 2.6.9 of the Draft Program EIR/EIS). In only two segments were freeway alignments considered as part of the HST Alternative. The segment from the Inland Empire to San Diego (I-215/I-15) corridor where there are no existing rail rights-of-way, and the I-880 alignment between San Jose and Fremont. In each of these cases, these options were determined to have the least potential environmental impacts at a program level analysis. In the case of the I-215/I-15 corridor, no other feasible alignment option was identified. Should the HST proposal move forward, project specific analysis will address in detail the potential impacts of the HST system on highway facilities. Please see response to Comment AS009-45.

**AS009-47**

The potential "interconnectivity" that the HST alternative could provide for the Central Valley airports and intercity highways was not considered to be significant enough to note as part of this Program EIR/EIS. Should the HST proposal move forward this may be considered as part of future studies.

**AS009-48**

See Final Program EIR/EIS Section 3.1.4.B.

**AS009-49**

The section referenced on Page 3.1-17 is referring to alternative station locations and as mentioned in your comment, there is only one station option in Fresno that is carried forward in the Program EIR/EIS.

**AS009-50**

The analysis method is appropriate and adequate for the program level EIR/EIS. Caltrans plans and reports and local agency site-specific planning documents would be fully considered in subsequent project level environmental review.

**AS009-51, 52, 53, & 54:**

Acknowledged. The Authority plans to cooperate with the Department in the development of corridor plans and concepts, and to coordinate with Department regarding proposed HST system planning, and looks forward to the Department inclusion of the proposed HST system in its planning efforts. See also above response to Comment AS009-35.

**AS009-55**

Section 2.3.3 has been added to the Final Program EIR/EIS to address related projects. Please also see response to Comment AL061-1.

**AS009-56**

The Authority has identified the SR-58/Soledad Canyon Corridor (Antelope Valley) with an HST station at Palmdale as the preferred option for crossing the Tehachapi Mountains between the Central Valley and Southern California.

**AS009-57**

Please see standard response 10.1.7. The Authority has identified Los Angeles Union Station as a potential HST station location and the I-215/I-15 Corridor (via the Inland Empire) as the preferred HST alignment between Los Angeles and San Diego.

**AS009-58**

Coordination with state and federal agencies has been and would continue to be an essential part of environmental review of the proposed HST system. During project level environmental review, agency coordination would focused on, regional and site-specific resources and issues, including intermodal connectivity, Native American and archaeological resources, wildlife corridors, noise, and construction impacts, as well as coordination with other projects and actions in the vicinity of proposed HST facilities and permitting of construction. Please also see the discussion of "design practices" in Chapter 3 of the Final Program EIR/EIS.

**AS009-59**

The certified Final Program EIR/EIS will support future corridor preservation activities for preferred corridors. Please also see response to Comment AS009-30.

**AS009-60**

See Sections 2.6.6 and 2.6.7 of the Draft Program EIR/EIS.

**AS009-61**

Acknowledged.

**AS009-62**

These issues will be further addressed in subsequent implementation and planning studies, in project level environmental reviews and in engineering and design work. Each section of Chapter 3 also outlines specific design features that will be applied to the implementation of the HST system to avoid, minimize, and mitigate potential impacts. The Authority's powers are sufficient to build and operate the proposed HST system, including the use of contractors.

**AS009-63**

The Authority does not have jurisdiction over local land use decisions, but it expects to work with local jurisdictions to encourage denser development around station areas. The potential for traffic impacts related to the HST stations (exclusive of other land use changes) are presented in the Program EIR/EIS. Detailed traffic analysis would be completed for project level environmental review. Please refer to Chapter 6B of the Final Program EIR/EIS regarding transit oriented development guidelines.

**AS009-64**

During the screening evaluation, a station option was considered on the BNSF alignment near Farmington Road. The station option was eliminated from further consideration. See Section 2.6.9.B., Page 2-59. The Final Program EIR/EIS identifies the Downtown Stockton ACE station as preferred. However, based upon your comment, the Authority has recommended that a potential Stockton station along the BNSF alignment be considered at the project-level.

**AS009-65**

Chapter 5 of the Program EIR/EIS analyzes the growth inducement potential at a regional and county level. Section 5.3.5. addresses differences between HST Alignment options. However, it would be primarily HST stations, rather than alignments, which would have the potential to induce growth. In addition the Authority has not identified the bypass options at Merced and Modesto as within the preferred alignment option for the Central Valley segment of the proposed HST system. See also response to Comment AF008-13.

**AS009-66**

Specific issues pertaining to the interface between the new UC Merced campus and the Merced HST station options would be identified and addressed in a subsequent project level review.

**AS009-67**

Page 3.1-5, Item C has been revised to include I-205.

**AS009-68**

The section referenced on Page 3.1-17 is referring to alternative station locations and because there is only one station option in Stockton that is carried forward in the Draft Program EIR/EIS, no comparative analysis is needed.

**AS009-69**

Acknowledged.

**AS009-70**

Acknowledged. Please see standard response 2.1.1 and standard response 2.1.2.

**AS009-71**

Acknowledged.

**AS009-72**

Acknowledged.

**AS009-73**

Specific design solutions will be addressed as part of subsequent project level environmental reviews. Please see the "design practices" descriptions included as part of Chapter 3 (for each environmental resource area) of the Final Program EIR/EIS document.

**AS009-74**

Acknowledged. Please see standard response 10.1.7.

**AS009-75**

See standard response 6.3.1. Neither CEQA nor NEPA require an environmental impact report or statement to include a cost/benefit analysis.

**AS009-76**

Acknowledged.

**AS009-77**

Acknowledged.

**AS009-78**

Acknowledged.

**AS009-79**

Acknowledged. Please also see response to Comment AL040-5.

**AS009-80**

Acknowledged. Please see standard response 2.36.1.

**AS009-81**

Acknowledged. The analysis was done at an appropriate level for a program EIR/EIS document. Should the HST proposal move forward, more detail analysis will be done as part of future project-specific studies.

**AS009-82**

A business plan and not an MIS was prepared by the Authority for the proposed HST system. A number of previous feasibility studies for the HST system are referenced in the Program EIR/EIS (see Section 2.3.1), which addresses comparison of an HST system to other modal alternatives.

**AS009-83**

Please see standard response 2.7.1 and standard response 2.7.3.

**AS009-84**

Acknowledged.

**AS009-85**

Statewide and regional growth inducing potential is addressed in Chapter 5. Potential local growth inducing impacts associated with particular proposed stations will be addressed in subsequent project level environmental review.

**AS009-86**

Passenger costs were estimated and compared based on average passenger costs per mode and per trip for five representative city pairs and assuming full HST system operation. See Page 3.2-34 "Passenger Cost".

**AS009-87**

Specific programs are not defined at this stage of study, however, the HST would be a commercial system and use of the system would be encouraged by price incentives, and other advantages/benefits of the HST system including, but not limited to, excellent safety and reliability, reduced passenger cost, convenience, and competitive trip times.

**AS009-88**

Operations and maintenance (O&M) related costs are estimated in Section 4.3.2 of the Program EIR/EIS. Revenue and O&M cost estimates prepared for the Authority's Final Business Plan indicated a statewide HST system in California could operate at a revenue surplus, including all operations and maintenance cost elements. The HST system is being advanced as a commercially viable proposal that would cover operating costs with system revenues.

**AS009-89**

Please see response to Comment AS009-35. These topics will be addressed comprehensively in subsequent project level environmental review.

**AS009-90**

Please see standard response 6.41.1.

**AS009-91**

Acknowledged.

## Comment Letter AS010

**AS010**

STANDING COMMITTEES
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California State Senate

SENATOR
JEFF DENHAM
TWELFTH SENATE DISTRICT

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RULES COMMITTEE APPOINTMENTS
CALIFORNIA EMERGENCY COUNCIL
NATIONAL CONFERENCE OF STATE LEGISLATURES
COUNCIL OF STATE GOVERNMENTS - WEST

AUG 31 2004

April 5, 2004

Mr. Jospeh E. Petrillo, Chairperson
High Speed Rail Authority
925 L Street
Sacramento, CA 95814

Dear Mr. Petrillo:

As you are well aware, transportation is a major issue in the Central Valley and throughout all of California. Traffic and congestion plague our roads and highways making it clear that the importance of high-speed rail cannot be ignored.

As the High Speed Rail Authority progresses in bringing a high-speed rail system to California, I would like to offer my strong support for the location of a maintenance hub at the former Castle Airforce Base in Atwater. The Castle Airport Aviation and Development Center is an excellent site for the maintenance facility. This site is centrally located to the rail system, has the necessary acreage of land available and the airport is available for transportation of necessary products for construction and maintenance of the system.

AS010-1

Additionally, Merced County consistently ranks in double-digit unemployment. The location of the maintenance facility at Castle Airport Aviation and Development Center is estimated to create 2,000 full-time jobs for the community in a variety of skill sets. Our community has the labor force available to fill these jobs and putting these people to work allows for an economic influx into the area.

I would like to reiterate my support for the location of the High Speed Rail Maintenance Facility at Castle Airport Aviation and Development Center. This site is a great match for the needs of a maintenance facility as well as a match for the community.

Sincerely,

JEFF DENHAM
Senator, 12th District

cc: Dr. Lee Boese, Jr., Chairman, Merced High Speed Rail Committee

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MERCED, CA 95348
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## Response to Comments of Jeff Denham, Senator, California State Senate, August 31, 2004 (Letter AS010)

**AS010-1**

Acknowledged. Please see standard response 2.35.1.

## Comment Letter AS011

AS010

**California Regional Water Quality Control Board**
**Santa Ana Region**

**Terry Tamminen**
*Secretary for Environmental Protection*

3737 Main Street, Suite 500, Riverside, California 92501-3348
(951) 782-4130 • Fax (951) 781-6288
http://www.swrcb.ca.gov/rwqcb8

**Arnold Schwarzenegger**
*Governor*

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September 1, 2004

Dan Leavitt
California High-Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814

**DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT AND ENVIRONMENTAL IMPACT STATEMENT (EIR/EIS) FOR THE CALIFORNIA HIGH-SPEED TRAIN SYSTEM, SCH #2001042045**

Dear Mr. Leavitt:

Staff of the Regional Water Quality Control Board, Santa Ana Region (RWQCB), have reviewed the May 2004 EIR/EIS regarding the proposed high-speed train system that would extend from San Diego to Sacramento, including portions of Orange, Riverside, and San Bernardino Counties under Region 8 jurisdiction. We have the following comments:

Section 3.14, Hydrology and Water Resources, and Section 3.15, Biological Resources satisfactorily cover the types of surface water, wetland, and groundwater issues of concern during the construction of the routes. Although no water bodies in Region 8 are identified for potential impacts, we request that any new channel crossings, or proposed revisions to channel crossings, be inventoried and identified in the final EIR/EIS and during the noted Clean Water Act Sections 404/401 permit application process. Information concerning Section 401 certification can be found at the Regional Board's website, www.swrcb.ca.gov/rwqcb8/html/401.html

AS011-1

The DEIR implies that if the proposed San Bernardino loop alignment route is chosen, there will be fewer overall "potentially impacted waters and wetlands" than if routes are chosen that include the Riverside, Colton, and University of California Riverside alignments and stations. Board staff believes that the alignment that least affects water quality standards (that is, quality objectives and beneficial uses) identified in the Santa Ana River Basin Water Quality Control Plan - Region 8 should be selected over others.

AS011-2

If you have any questions, please contact Glenn Robertson at (909) 782-3259 or me at (909) 782-3234.

Sincerely,

Mark G. Adelson, Chief
Regional Planning Programs Section

cc: Scott Morgan – State Clearinghouse

Q: Planning/Groberts/Letters/DEIR-USDOT- CA High Speed Train System

*California Environmental Protection Agency*

*Recycled Paper*

## Response to Comments of Mark G. Adelson, California Regional Water Quality Control Board, September 1, 2004 (Letter AS011)

**AS011-1**

Acknowledged. No additional or different water crossings have been identified in the Final Program EIR/EIS for Region 8. See discussion of "design practices" in Chapter 3 (for each environmental resource area) of the Final Program EIR/EIS.

**AS011-2**

Acknowledged. Please see standard response 6.29.3.